

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GULFPORT ENERGY CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 20-35562 (DRJ)

) (Jointly Administered)
)
)

**FEE STATEMENT OF WACHTELL, LIPTON, ROSEN & KATZ FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THE SPECIAL COMMITTEE FOR THE BOARD OF
DIRECTORS OF GULFPORT ENERGY CORPORATION FOR THE PERIOD FROM
MARCH 1, 2021 THROUGH MARCH 31, 2021**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Gulfport Energy Corporation (1290); Gator Marine, Inc. (1710); Gator Marine Ivanhoe, Inc. (4897); Grizzly Holdings, Inc. (9108); Gulfport Appalachia, LLC (N/A); Gulfport MidCon, LLC (N/A); Gulfport Midstream Holdings, LLC (N/A); Jaguar Resources LLC (N/A); Mule Sky LLC (6808); Puma Resources, Inc. (6507); and Westhawk Minerals LLC (N/A). The location of the Debtors' service address is: 3001 Quail Springs Parkway, Oklahoma City, Oklahoma 73134.

Name of Applicant:	Wachtell, Lipton, Rosen & Katz	
Applicant’s Role in Case:	Counsel to the Special Committee of the Board of Directors of Gulfport Energy Corporation	
Date Order of Employment Signed:	01/27/2020 [Docket No. 696]	
	Beginning Period	of End of Period
Time period covered by this Application:	3/1/21	3/31/21
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$364,974.00 (80% of \$456,217.50)	
Total Expenses Requested in this Statement:	\$1,053.80	
Total Fees and Expenses Requested in this Statement:	\$366,027.80	
Summary of Attorney Fees Requested		
Total Attorney Fees Requested in this Statement:	\$346,776.00 (80% of \$433,470.00)	
Total Actual Attorney Hours Covered by this Statement:	381.1	
Average Hourly Rate for Attorneys:	\$1,137.42	
Summary of Paraprofessional Fees Requested		
Total Paraprofessional Fees Requested in this Statement:	\$18,198.00 (80% of \$22,747.50)	
Total Actual Paraprofessional Hours Covered by this Statement:	57.2	
Average Hourly Rate for Paraprofessionals:	\$397.68	

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), the *Order Granting Application to Employ and Retain Wachtell, Lipton, Rosen & Katz as Counsel to the Special Committee of the Board of Directors of Gulfport Energy Corporation Pursuant to Sections 327(3), 330(a), and 1107(b) of the Bankruptcy Code and Bankruptcy Rule 2014, Effective as of the Petition Date* [Docket No. 696] (the “Retention Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 387] (the “Interim Compensation Order”), Wachtell, Lipton, Rosen & Katz (“Wachtell Lipton”), attorneys for the Special Committee of the Board of Directors of Gulfport Energy Corporation (the “Parent Special Committee”), hereby files this monthly fee statement (the “Monthly Fee Statement”) for (i) compensation in the amount of \$364,974.00 for the reasonable and necessary legal services Wachtell Lipton rendered to the Parent Special Committee from March 1, 2021 through and including March 31, 2021 (the “Fee Period”) (80% of \$456,217.50) and (ii) reimbursement for the actual and necessary expenses that Wachtell Lipton incurred during the Fee Period in the amount of \$1,053.80.

Itemization of Services Rendered and Disbursements Incurred

1. In support of this Monthly Fee Statement, attached are the following exhibits:

- **Exhibit A** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Wachtell Lipton partners, associates, and paraprofessionals during the Fee Period. As reflected in **Exhibit A**, Wachtell Lipton incurred \$456,217.50 in fees during the Fee Period. Pursuant to this Monthly Fee Statement, Wachtell Lipton seeks reimbursement of 80% of such fees (\$364,974.00 in the aggregate).
- **Exhibit B** is a schedule providing certain information regarding the Wachtell Lipton attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Monthly Fee Statement. Attorneys and

paraprofessionals of Wachtell Lipton have expended a total of 438.3 hours in connection with these chapter 11 cases during the Fee Period.

- **Exhibit C** is a schedule for the Fee Period, setting forth the total amount of reimbursement sought with respect to each category of expenses for which Wachtell Lipton is seeking reimbursement in this Monthly Fee Statement. All of these disbursement comprise the requested sum for Wachtell Lipton's out-of-pocket expenses.
- **Exhibit D** consists of Wachtell Lipton's records of fees and expenses incurred during the Fee Period in providing professional services to the Parent Special Committee.

Representations

2. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Wachtell Lipton reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements and fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Interim Compensation Order.

WHEREFORE, Wachtell Lipton requests allowance of its fees and expenses incurred during the Fee Period in the total amount of \$366,027.80 consisting of (a) \$364,974.00, which is 80% of the fees incurred by the Parent Special Committee for reasonable and necessary professional services rendered by Wachtell Lipton, and (b) \$1,053.80 for actual and necessary costs and expenses, and that such fees and expenses be paid as administrative expenses of the Debtors' estates.

New York, New York

Dated: April 14, 2021

Respectfully Submitted,

WACHTELL, LIPTON, ROSEN & KATZ

/s/ Emil A. Kleinhaus

Richard G. Mason (*pro hac vice*)

Emil A. Kleinhaus (*pro hac vice*)

Angela K. Herring (*pro hac vice*)

Michael H. Cassel (*pro hac vice*)

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*Counsel to the Special Committee of the Board of
Directors of Gulfport Energy Corporation*

CERTIFICATE OF SERVICE

I certify that on April 14, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

Dated as of April 14, 2021

/s/ Emil A. Kleinhaus
Emil A. Kleinhaus

EXHIBIT A**Summary of Legal Fees and Expenses for the Fee Period**

Category	Total Billed Hours	Total Fees
Category A: Board of Directors Matters	52.8	\$75,657.50
Category B: Case Administration	1.4	\$1,225.00
Category C: Litigation Matters	380.3	\$376,130.00
Category D: Retention and Fee Applications	3.8	\$3,205.00

EXHIBIT B**Summary of Hours Billed by Wachtell Lipton and Paraprofessionals for the Fee Period**

Timekeeper	Position	Department	Hourly Billing Rate	Total Billed Hours	Total Fees
David A. Katz	Partner	Corporate	\$1800	15.2	\$27,360.00
Emil A. Kleinhaus	Partner	Restructuring & Finance / Litigation	\$1450	97.3	\$141,085.00
Angela K. Herring	Associate	Restructuring & Finance	\$1175	94.2	\$110,685.00
Michael H. Cassel	Associate	Restructuring & Finance	\$1025	93	\$95,325.00
Mitchell S. Levy	Law Clerk	Restructuring & Finance	\$725	81.4	\$59,015.00
Aaron R. Samaroo	Support Staff	Automated Legal Support	\$375	6.3	\$2,362.50
Ann Marie Ghany	Support Staff	Automated Legal Support	\$325	2.7	\$877.50
Fredrik D.Z. Hoosein	Support Staff	Automated Legal Support	\$325	4.5	\$1,462.50
Gene Chollick	Support Staff	Automated Legal Support	\$450	4	\$1,800.00
Juan Rojas	Support Staff	Automated Legal Support	\$375	6	\$2,250.00
Kelum S. Wick	Support Staff	Automated Legal Support	\$375	1.5	\$562.50
Kyaik P. Tan	Support Staff	Automated Legal Support	\$325	4	\$1,300.00
Livia Tam	Support Staff	Automated Legal Support	\$375	3.3	\$1,237.50
Luis A. McNish	Support Staff	Automated Legal Support	\$550	1.9	\$1,045.00
Soe Min	Support Staff	Automated Legal Support	\$325	4.0	\$1,300.00
Ye Li	Support Staff	Automated Legal Support	\$450	19	\$8,550.00

EXHIBIT C

Summary of Expenses for the Fee Period

Category	Total Expenses
Courier Service	\$134.72
Legal Research	\$919.08

EXHIBIT D**Detailed Description of Fees, Expenses, and Disbursements****Category A: Board of Directors Matters**

Date	Name	Hours	Description
3/1/2021	David A. Katz	2.50	Prep for board meeting and review/comment on board materials for same; communications with team and clients re governance and board issues
3/1/2021	Emil A. Kleinhaus	2.30	Call with committee counsel and prep for same (1 hr); review and comment on presentation for special committee (1 hr and 18 mins)
3/2/2021	David A. Katz	1.50	Prep for board meeting and review/comment on board materials for same; communications with team and clients re governance and board issues
3/2/2021	Emil A. Kleinhaus	4.30	Work on special committee presentation (2 hrs); call with C Koenig re case issues (30 mins); review of Chilmark slides and call with Chilmark re same (48 mins); attention to creditors committee proposal and company analysis of same (1 hr)
3/2/2021	Michael H. Cassel	3.10	Revise Chilmark update presentation (1.1), call with Chilmark (1.0), further revisions and modifications to same and e-mail to Chilmark (1.0).
3/3/2021	David A. Katz	3.00	Prep for board meeting and review/comment on board materials for same; communications with team and clients re governance and board issues
3/3/2021	Emil A. Kleinhaus	4.30	Work on special committee presentation and prep for special committee meeting (3 hrs); call with client re board issues (48 mins); attention to company financial materials (30 mins)
3/3/2021	Michael H. Cassel	2.00	Review and comment on board presentation and transmit to board.
3/4/2021	David A. Katz	6.30	Special committee and full board meeting; prep for meetings and numerous communications with clients and team relating to meetings and governance/board issues
3/4/2021	Emil A. Kleinhaus	4.30	Special committee meeting (48 mins); prep for special committee meeting (1 hr); full board meeting and review of materials for same (1 hr and 30 mins); calls and emails with Chilmark re plan and valuation issues (1 hr)
3/4/2021	Michael H. Cassel	1.50	Attend special committee meeting and prepare minutes of same.

3/5/2021	David A. Katz	1.30	Follow up to board meetings; communications with team and clients re governance and board issues
3/5/2021	Emil A. Kleinhaus	2.50	Calls with K+E re plan issues and potential settlements (1 hr); calls with D Katz re board issues (30 mins); calls with Chilmark re valuation issues and potential expert work (1 hr)
3/7/2021	David A. Katz	0.30	Review and comment on board meeting minutes
3/7/2021	Michael H. Cassel	0.70	Revise draft minutes of Mar 4 Board Meeting
3/8/2021	David A. Katz	0.30	Review of board meeting minutes and materials
3/11/2021	Michael H. Cassel	0.40	Call with board members re litigation/discovery issues
3/17/2021	Angela K. Herring	1.80	Work on board presentation and related research
3/18/2021	Angela K. Herring	4.00	Work on board presentation and related research
3/19/2021	Angela K. Herring	2.10	Work on board presentation and related research
3/19/2021	Michael H. Cassel	0.60	Provide comments to AKH on board presentation
3/20/2021	Angela K. Herring	0.50	Revise board presentation
3/23/2021	Emil A. Kleinhaus	1.50	Prep for parent board meeting and attention to draft board materials
3/23/2021	Angela K. Herring	1.40	Revise and circulate draft board presentation
3/26/2021	Emil A. Kleinhaus	0.30	Emails re board meeting

Category B: Case Administration

Date	Name	Hours	Description
3/1/2021	Michael H. Cassel	0.70	Calls with UCC (D. Mannal) and E. Kleinhaus re case progress and issues
3/2/2021	Mitchell S. Levy	0.70	Drafting supplemental filing re firm retention

Category C: Litigation Matters

Date	Name	Hours	Description
3/2/2021	Juan Rojas	1.50	Process incoming document production and load to e-discovery database for attorney review
3/4/2021	Mitchell S. Levy	3.30	Attend Crowell deposition
3/4/2021	Michael H. Cassel	4.80	Attend deposition of K. Crowell (3.5) (dropped early), related matters re discovery and trial preparation (1.3).
3/5/2021	Emil A. Kleinhaus	2.20	Call with internal team re committee discovery requests and response to same (1 hr); review of committee discovery requests and emails with client and team re response to same (1 hr and 12 mins);
3/5/2021	Angela K. Herring	3.20	Read background materials, including plan, DS, and document requests (122 minutes); TC w EAK to discuss background and doc requests (15 min); team meeting w/ EAK, MHC and MSL re discovery and litigation strategy (54 min).
3/5/2021	Mitchell S. Levy	1.00	T/C with EAK, AKH and MAC re discovery and litigation strategy
3/5/2021	Mitchell S. Levy	4.00	Attend Heerwagen deposition
3/5/2021	Michael H. Cassel	3.70	Attend portions of Heerwagen deposition (1.7), e-mails re discovery (.5), internal discussions re discovery and trial preparation (1.0), call with Chilmark (.5).
3/5/2021	Aaron R. Samaroo	1.20	Prepare incoming electronic documents for in the document review repository for attorney review
3/6/2021	Emil A. Kleinhaus	3.50	Attention to expert report topics and outline (3 hrs); emails with company advisors re plan issues (30 mins)
3/6/2021	Angela K. Herring	0.20	Review doc requests and emails re: doc collection strategy.
3/6/2021	Michael H. Cassel	1.50	communications with Chilmark re scope of expert work, e-mails regarding trial strategy.
3/7/2021	Angela K. Herring	0.20	Emails with team re: doc collection strategy.
3/7/2021	Luis A. McNish	1.90	Searched Firm's email archives and exported results for attorney review
3/7/2021	Aaron R. Samaroo	2.00	Prepare WLRK electronic documents for case specific searching and collection, and processing and loading in the document review repository for attorney review
3/7/2021	Michael H. Cassel	1.30	Attention to discovery issues and scope of expert work

3/8/2021	Angela K. Herring	2.30	Discuss meet + confer strategy & case status w/ M. Cassel (0.6 h); review search results for possible doc production and prepare written responses (1.2 h); meet and confer with counsel to UCC re doc requests (0.3 h); follow-up discussion w/ M. Cassel (0.2 h).
3/8/2021	Mitchell S. Levy	0.30	Attend Meet and Confer with counsel to UCC
3/8/2021	Mitchell S. Levy	1.30	Drafting responses & objections to discovery requests
3/8/2021	Michael H. Cassel	5.90	Discussions with Chilmark and followup e-mails regarding same (1.3), research for use in expert discovery case (3.5), Prepare for meet and confer on UCC discovery and discuss with AKH re same (.5), attend meet and confer with Kramer Levin (.5), followup e-mail re same (.1)
3/8/2021	Ye Li	3.60	Worked with the ALS team to process the Wachtell emails for attorneys review. Performed advanced searches for attorneys review.
3/8/2021	Kyaik P. Tan	2.50	Imported data into processing engines, OCR'd docs, created images, exported data for attorney review. loaded data to Relativity.
3/8/2021	Fredrik D.Z. Hoosein	2.50	Processed data using relativity, created images for attorney review, performed database indexing
3/9/2021	Emil A. Kleinhaus	2.00	Attention to discovery requests and responses to same (1 hr); review of Chilmark work product and expert outline (1 hr)
3/9/2021	Angela K. Herring	8.10	Team call re doc review strategy (0.4 h); review documents for response to committee discovery requests (7.7 h).
3/9/2021	Mitchell S. Levy	0.30	T/C with MHC and AKH re: document production
3/9/2021	Mitchell S. Levy	1.30	Reviewing documents for production
3/9/2021	Mitchell S. Levy	1.50	Drafting responses & objections to discovery requests
3/9/2021	Michael H. Cassel	7.00	Research for use in expert discovery case (2.1), calls and e-mails with Chilmark re same and attention to draft expert report (2.5), Internal call re document review (.5), draft response to UCC discovery e-mail and circulate for comments (.4), revise and send (.2), calls and e-mails with AKH re discovery issues (1.3)
3/9/2021	Ye Li	3.30	Worked with the ALS team to create email threading analytics in Relativity and created the review batches for attorneys review.
3/9/2021	Gene Chollick	2.50	Metadata deduplication to cull documents previously produced.

3/9/2021	Kelum S. Wick	0.90	Running email threading analytics in Relativity workspace in order to prepare document batches organized by thread group for attorney review
3/10/2021	Emil A. Kleinhaus	2.50	Call with K+E re confirmation prep (42 mins); review and comment on Chilmark work product/expert material (1 hr and 48 mins).
3/10/2021	Angela K. Herring	5.70	Review documents for production to creditors committee and coordinate document collection and production matters.
3/10/2021	Mitchell S. Levy	2.50	Reviewing documents for production
3/10/2021	Mitchell S. Levy	0.90	Drafting Responses & Objections to document requests
3/10/2021	Michael H. Cassel	4.30	Review derivative standing motion and complaint (.3), Conference with AKH re collection, production and related matters (.9), call with EAK and followup e-mails re expert case (.6), e-mails re discovery matters (.5), develop expert case (2.0)
3/10/2021	Ye Li	1.80	Identified the duplicates documents by comparing the metadata fields for sets of incoming production documents.
3/10/2021	Kyaik P. Tan	0.50	Imported data into processing engines, OCR'd docs, created images, exported data for attorney review, loaded data to Relativity.
3/10/2021	Fredrik D.Z. Hoosein	0.50	Troubleshoot problem files for caseteam review.
3/11/2021	Emil A. Kleinhaus	2.30	Call with K+E and Perella re confirmation prep (30 mins); call with team re special committee matters (18 mins); further review and comment on Chilmark expert material (1 hr); call with special committee members re discovery/litigation (30 mins).
3/11/2021	Angela K. Herring	3.60	Call w/ EAK/MHC re trial + discovery strategy (0.2 h); call w/ clients re doc collections (0.3 h); prep doc production (2.5 h); draft fact section for brief (0.6 h).
3/11/2021	Mitchell S. Levy	1.00	Drafting Responses & Objections
3/11/2021	Mitchell S. Levy	0.30	T/C with AKH and MHC re: brief
3/11/2021	Mitchell S. Levy	3.90	Reviewing documents for production
3/11/2021	Ye Li	0.60	Coordinated with the client for data transfer.
3/11/2021	Michael H. Cassel	3.70	Internal call with team (.5), call with K&E + Chilmark (1.0), e-mails and messages regarding discovery and production and related matters (1.5), calls with Chilmark re production and related matters (.7)
3/12/2021	Angela K. Herring	7.60	Review documents for privilege and response to UCC requests (6 hrs); draft witness outline (0.5 h); revise R&Os to document requests (1 h).

3/12/2021	Mitchell S. Levy	1.30	Work on R&Os to committee requests
3/12/2021	Mitchell S. Levy	0.50	Communications with ALS re: document production
3/12/2021	Mitchell S. Levy	0.80	Reviewing documents for production/privilege
3/12/2021	Aaron R. Samaroo	1.10	Prepare "Parent Special Committee" electronic document repository for attorney review
3/12/2021	Ann Marie Ghany	0.80	Created searches for case team review. Compile data for processing. Email correspondences with case team
3/13/2021	Emil A. Kleinhaus	3.00	Attention to documents and board materials for production to creditors committee (1 hr); review and comment on draft expert report outline (2 hrs)
3/13/2021	Angela K. Herring	8.30	Review documents and prepare document production, R&Os and cover email.
3/13/2021	Mitchell S. Levy	0.80	Attention to R&Os to committee document requests
3/13/2021	Mitchell S. Levy	0.80	Communications with team re: production
3/13/2021	Mitchell S. Levy	4.50	Reviewing Chilmark documents for production
3/13/2021	Michael H. Cassel	0.40	Emails with AKH re discovery matters.
3/13/2021	Soe Min	3.50	Document management: Imported data into processing engines deduplicated files fixed corrupted and identified password protected files OCRd docs created images exported data for attorney review
3/13/2021	Aaron R. Samaroo	0.20	Prepare electronic documents in image format in the document review repository for attorney review and analysis
3/13/2021	Aaron R. Samaroo	1.20	Prepare Chilmark electronic documents in the document review repository for attorney review and analysis
3/14/2021	Emil A. Kleinhaus	2.70	Call with AH re privilege issues (42); attention to document production and privilege issues (2 hrs)
3/14/2021	Angela K. Herring	9.50	Call w/ EAK re doc production issues (1 h); QC and review documents and prepare document production (8.0 h); call w/ Kirkland re doc production (0.5 h)
3/14/2021	Mitchell S. Levy	0.50	T/C with A. Herring and K&E re: document production
3/14/2021	Mitchell S. Levy	4.60	Reviewing documents for production
3/14/2021	Mitchell S. Levy	2.50	Reviewing Chilmark documents for production
3/14/2021	Michael H. Cassel	0.90	Reply to AKH re discovery matters and Zoom with AKH re production of board materials.
3/14/2021	Soe Min	0.50	Document management: Imported data into processing engines deduplicated files fixed corrupted and identified password protected files OCRd docs created images exported data for attorney review

3/14/2021	Aaron R. Samaroo	0.60	Prepare electronic documents in the document review repository for attorney review and analysis
3/15/2021	Emil A. Kleinhaus	4.20	Emails and calls with team re creditors committee discovery and document production issues (2 hrs and 30 mins); review and comment on outline of expert report (1 hr and 12 mins); call with K+E and Perella re plan litigation (30 mins)
3/15/2021	Angela K. Herring	8.80	Finalize and serve document production and responses & objections.
3/15/2021	Mitchell S. Levy	0.80	Attention to R&Os
3/15/2021	Mitchell S. Levy	6.80	Reviewing documents for production
3/15/2021	Michael H. Cassel	0.60	Assist with filing of A. Herring PHV and attention to discovery matters.
3/15/2021	Ye Li	1.30	Worked with the ALS team to bates stamp the electronic documents for a production.
3/15/2021	Juan Rojas	3.20	Prepare document set for production to outside party per Angela Herring request
3/15/2021	Juan Rojas	1.30	Process incoming document production and load to e-discovery database for attorney review per Michael Cassel request
3/15/2021	Ann Marie Ghany	1.90	uploaded various files to the network. compile data for processing. modified and imported various load files. QC data and updated indices. Email correspondences with case team.
3/16/2021	Emil A. Kleinhaus	4.30	Review and comment on draft expert material (2 hrs and 12 mins); calls with C Koenig re plan issues (30 mins); call with internal team re plan issues (18 mins); call with company finance re models and prep for same (48 mins); call with J Ellis re expert report (30 mins)
3/16/2021	Angela K. Herring	1.60	Follow-up re doc production and depo scheduling (0.4 h); call w/ Roger E. (0.6 h); draft fact section (0.6 h).
3/16/2021	Mitchell S. Levy	1.00	Prepare documents for document production
3/16/2021	Ye Li	1.80	Identified the duplicate documents by comparing the metadata fields for attorneys review.
3/16/2021	Gene Chollick	1.50	Dataset deduplication
3/17/2021	Emil A. Kleinhaus	5.10	Call with Chilmark re expert report (1 hr and 36 mins); review and comment on expert work product (2 hrs and 30 mins); call with K+E re litigation prep (30 mins); calls with debtor advisors re committee negotiations (30 mins)
3/17/2021	Mitchell S. Levy	1.90	Drafting outline of confirmation submissions
3/17/2021	Mitchell S. Levy	0.50	T/C with EAK, AKH and MHC
3/17/2021	Mitchell S. Levy	1.30	Caselaw research re: confirmation issues

3/17/2021	Michael H. Cassel	6.70	Zoom with team (EAK, AKH, MSL) (.8), Zoom with Chilmark (1.5), Zoom with K&E, Chilmark, and PWP/TP (.5), provide via e-mail requested information to EAK and call regarding same (.4), review and revise draft Chilmark report (3.5)
3/17/2021	Angela K. Herring	2.20	Lit team update/planning call (0.5 h); call w/ Chilmark (1.7 h)
3/18/2021	Emil A. Kleinhaus	4.80	Calls and emails with debtor advisors re committee negotiations and plan litigation (48 mins); further review and comment on expert report and related financial materials (1 hr and 30 mins); call with team re plan litigation and special committee issues (30 mins); attention to committee standing motion (30 mins); review of deposition transcripts of company witnesses (1 hr and 30 mins)
3/18/2021	Mitchell S. Levy	2.70	Caselaw research re: confirmation issues
3/18/2021	Mitchell S. Levy	0.50	T/C with E. Kleinhaus, A. Herring and M. Cassel
3/18/2021	Michael H. Cassel	5.90	Zoom with EAK, AKH, and MSL re status of matter (.5), draft and revise Chilmark report and attention to related matters (5.4)
3/18/2021	Angela K. Herring	0.70	Lit team planning meeting (0.4 h); attention to scheduling matters (0.3 h).
3/19/2021	Emil A. Kleinhaus	4.20	Further review and comment on draft expert report and materials (2 hrs and 12 mins); work on draft materials for special committee meeting (1 hr); review of special committee minutes and prior meeting materials (30 mins); emails with team re discovery and litigation issues (30 mins)
3/19/2021	Mitchell S. Levy	2.80	Caselaw research re: confirmation issues and drafting outline of confirmation brief
3/19/2021	Kyaik P. Tan	1.00	Loaded 2 production sets to Relativity.
3/19/2021	Kelum S. Wick	0.30	Document management: Preparing PDF exports of certain produced documents from Relativity workspace with opaque and transparent redactions in order to make both versions of the documents available for offline attorney review
3/19/2021	Angela K. Herring	2.90	Meet and confer w/ UCC (0.3 h); follow up re doc production issues (2.6 h).
3/19/2021	Michael H. Cassel	5.50	Attend meet & confer with UCC regarding discovery issues (.4) and call and send e-mail followup re same (.3), draft and revise Chilmark report and e-mails and calls with E. Kleinhaus and J. Ellis (.3) regarding same (4.9)

3/20/2021	Emil A. Kleinhaus	6.90	Chilmark zoom call re expert report (1 hr and 54 mins); additional calls with J Ellis at Chilmark re expert issues and materials (1 hr and 18 mins); calls with K+E re litigation and settlement issues (1 hr and 12 mins); further review and comment on expert report and related materials (2 hrs and 30 mins)
3/20/2021	Michael H. Cassel	2.90	Call with Chilmark and E. Kleinhaus re expert report (2.1), calls with EAK regarding same (.4), attention to revising report (.4)
3/20/2021	Angela K. Herring	4.10	Follow-up on document production issues (2.5 h); draft deposition prep outline (1.56 h).
3/21/2021	Emil A. Kleinhaus	9.00	Zoom calls with Chilmark team members re expert report (3 hours and 48 mins); further review and comment on expert report and materials (3 hrs and 30 mins); review of document production and attention to privilege issues (42 mins); emails and short calls with team re discovery and expert issues (30 mins); calls with K+E re settlement discussions and litigation issues (30 mins)
3/21/2021	Angela K. Herring	4.20	Follow-up on document production and prepare supplemental production (2.7 h); draft deposition prep outline (1.5 h).
3/21/2021	Mitchell S. Levy	4.00	Drafting outline of confirmation case
3/21/2021	Mitchell S. Levy	5.20	Caselaw research re: confirmation issues
3/21/2021	Mitchell S. Levy	1.20	Privilege review for document production
3/21/2021	Michael H. Cassel	5.70	Call with Chilmark and E. Kleinhaus re expert report (2.9), further e-mails containing revisions re same (1.4), calls with EAK (.3), conf. call with Chilmark (.5), e-mails and research re legal standard for issue (.3), review legal outline from M. Levy and provide initial comments (.3)
3/22/2021	Angela K. Herring	7.80	Lit team zoom meeting re docs follow up (0.9 h); finalize and send out supplemental production and cover email (5.1 h); draft deposition prep outline (1 h); begin work on draft brief (.8 h).
3/22/2021	Mitchell S. Levy	1.70	Revising outline of confirmation submissions
3/22/2021	Mitchell S. Levy	1.30	Caselaw research re: confirmation issues
3/22/2021	Mitchell S. Levy	1.00	T/C w. E. Kleinhaus, A. Herring and M. Cassel re discovery and privilege issues

3/22/2021	Michael H. Cassel	8.50	Call re production and privilege issues (.9), Zoom with Chilmark re expert report (1.4), revise and review expert report and calls and followup e-mails with Chilmark (2.0), review supplemental production (.4), discussions with AKH re production and preparation of case (.8), review of documents provided for consideration in our report and calls with EAK re same (2.5), call with J. Feld at K&E (.5)
3/22/2021	Ye Li	2.80	Document management: identified the supplemental production documents and worked with the ALS team to bates stamp these documents for a production.
3/22/2021	Livia Tam	0.70	QC'ed document designation tags, and built PDF images for review
3/22/2021	Livia Tam	0.60	Reviewed and analyzed data, uploaded outgoing production files to FTP for review
3/22/2021	Livia Tam	0.80	Prepared and analyzed production data, QC'ed document designation tags, built images for outgoing production and created preproduction set for attorney review
3/22/2021	Livia Tam	1.20	Prepared and analyzed production data, rebuilt 3 separate production set of images for outgoing production and created preproduction search for attorney review
3/22/2021	Emil A. Kleinhaus	5.70	Further review and comment on expert report (2 hrs and 30 mins); calls and emails with Chilmark and team re expert report (1 hr); prep for board meeting and review/markup of board materials (1 hr and 18 mins); call with team re discovery and privilege issues (54 mins)
3/23/2021	Mitchell S. Levy	1.90	Caselaw research re: confirmation issues
3/23/2021	Mitchell S. Levy	1.30	Caselaw research re: confirmation issues and drafting outline of confirmation brief
3/23/2021	Mitchell S. Levy	0.30	T/C with A. Herring and M. Cassel
3/23/2021	Michael H. Cassel	7.80	Lead call with Chilmark re report flip (.8), call with A. Herring and M. Levy re updated status of matter and workstream coordination (.5), review Stingray objection and papers (2.5), review Chilmark report and attached documents and coordinate proposed production with ALS (2.0), review MSL outline of legal issues and develop argument (1.5), discussions with AKH re workstreams and status of brief (1.0)

3/23/2021	Ye Li	3.80	Worked with the ALS team to process and load the electronic documents into Relativity and to identify the duplicate documents in order for the case team to review the documents.
3/23/2021	Fredrik D.Z. Hoosein	1.50	Processed data using relativity, created images for attorney review, performed database indexing
3/23/2021	Kelum S. Wick	0.30	Performing meta data analysis comparing MD5 Hash values of newly processed documents against documents already loaded to the Relativity workspace in order to find any duplicative documents, as requested by case team.
3/23/2021	Emil A. Kleinhaus	4.70	Further review and comment on expert report and related materials (1 hr and 42 mins); calls and emails re potential committee settlement (30 mins); prep for deposition of parent board chair (2 hrs and 30 mins)
3/23/2021	Angela K. Herring	1.20	Prepare deposition prep outline (.9 hrs); check-in call w/ MSL and MHC re discovery issues (0.3 h).
3/24/2021	Emil A. Kleinhaus	2.00	Calls and emails with C Koenig and team re potential committee settlement (48 mins); further work on arguments for confirmation brief and call with M Cassel re same (1 hr and 12 mins)
3/24/2021	Angela K. Herring	1.30	Attention to scheduling issues (0.3 h); draft reply in support of plan (1 h).
3/24/2021	Mitchell S. Levy	1.80	Drafting confirmation brief sections
3/24/2021	Michael H. Cassel	4.40	Calls with E. Kleinhaus re status of matter and confirmation brief (.7), calls with J. Ellis re status of matter and updated report timing (.7), attention to confirmation brief and related matters (2.0), review Stingray issue and related matters (1.0)
3/25/2021	Emil A. Kleinhaus	0.50	Emails re committee settlement negotiations
3/25/2021	Angela K. Herring	0.80	Attention to scheduling matters; draft brief in support of confirmation.
3/25/2021	Mitchell S. Levy	2.50	Drafting confirmation brief sections
3/26/2021	Michael H. Cassel	1.00	Emails re settlement negotiations (.5); attention to confirmation brief issue (.5)
3/26/2021	Emil A. Kleinhaus	0.50	Emails with K&E and team re committee settlement (30 mins)
3/29/2021	Emil A. Kleinhaus	1.20	Review of objections to plan
3/29/2021	Angela K. Herring	0.10	Review plan objections.
3/30/2021	Emil A. Kleinhaus	1.80	Review of claim objection documents relating to Stingray claim (1 hr and 18 mins); review of filings re rejection and withdrawal of reference (30 mins)

3/31/2021	Emil A. Kleinhaus	4.70	Numerous calls and emails with Chris K. re settlement issues/developments (42 mins); call with special committee chair re settlement developments and prep for same (1 hr and 18 mins); attention to filings re Stingray claim (1 hr); call with creditors committee counsel (30 mins); further attention to expert report and potential revisions to same (30 mins); calls with M Cassel and J. Ellis re expert report (30 mins); attention to withdrawal of reference decision (12 mins)
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Category D: Retention and Fee Applications

Date	Name	Hours	Description
3/2/2021	Mitchell S. Levy	1.30	Attention to fee application
3/2/2021	Michael H. Cassel	1.50	Attention to interim fee application matters.
3/5/2021	Mitchell S. Levy	1.00	Attention to fee application

FEE PERIOD EXPENSE RECORDS

Date	Cost Type Description	Name	Amount
03/03/2021	Courier Service	David A. Katz	134.72
03/18/2021	Library-Lexis Research	Michael H. Cassel	49.56
03/20/2021	Library-Westlaw Recovery	Angela K. Herring	230.92
03/21/2021	Library-Westlaw Recovery	Michael H. Cassel	638.60